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March 14, 2025

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Adewale Olukayode, et al. v. The City of New York, et. al.,
25-CV-01232 (PAE)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants City of New York (“the City”), Former Mayor Bill De Blasio, Former New York City Police Department Commissioner Dermot Shea, and Former New York City Police Department Chief of Department Terence Monahan (hereinafter “defendants”) in the above-referenced matter. In that capacity, I write with the consent of plaintiffs’ counsel, Elena Cohen, Esq., to respectfully request a 60-day enlargement of time from March 18, 2025 to and including May 19, 2025 within which defendants may answer or otherwise respond to the Complaint. This is the first request for an enlargement of time.

In the Complaint, plaintiffs allege, *inter alia*, that they were subjected to false arrest and/or excessive force on various dates. Before we can adequately respond to the Complaint, we will need to conduct an investigation into the facts of the case. An enlargement of time will allow this Office time to receive the executed authorizations for the release of any underlying arrests and any medical records from plaintiffs and forward the authorizations with requests for records to the appropriate agencies and medical facilities. In order to respond to the allegations contained in the Complaint, defendants must obtain documents of the underlying criminal case including Police and District Attorney’s documents. It is our understanding that these documents may be sealed pursuant to New York Criminal Procedure Law § 160.50. Defendants cannot obtain these documents without these authorizations, and without the documents, defendants cannot properly assess this case or respond to the Complaint. Accordingly, defendants require this enlargement so that this Office may obtain the underlying documentation, properly investigate the allegations of the Complaint and fulfill our obligations under Rule 11 of the Federal Rules of Civil Procedure.

In view of the foregoing, defendants respectfully a 60-day extension of time, from March 18, 2025 to May 19, 2025, to answer or otherwise respond to the Complaint.

Thank you for your consideration herein.

Respectfully submitted,

/s/ *Jenny Weng*

Jenny Weng
Senior Counsel
Special Federal Litigation Division

cc: Counsels of Record (By ECF)